

Our File No. TAR-275-CM
ATTORNEY ID - 050371991
FISHMAN MCINTYRE LEVINE SAMANSKY, P.C.
120 Eagle Rock Avenue
East Hanover, New Jersey 07936
Tel: (973) 560-9000
Attorneys for Defendant, Target Corporation i/p/a Target

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LAKISHA CARPENTER	:	
	:	
Plaintiff,	:	
	:	
-vs-	:	CIVIL ACTION NO.
	:	
TARGET	:	
	:	
Defendants	:	
	:	

PETITION FOR REMOVAL

Petitioner, Target Corporation i/p/a Target, by its attorneys, Fishman McIntyre Levine Samansky, P.C., respectfully petitions the United States District Court for the District of New Jersey as follows:

1. Based on information and belief, Target Corporation first received a copy of the Complaint on or about April 29, 2022 through their registered agent.
2. This case was commenced on April 29, 2022 in the Superior Court of New Jersey, Law Division, Middlesex County Suit is identified in the Superior Court as Carpenter, Lakisha v. Target, Docket No. MID-L-2073-22. (See Exhibit A)
3. The filing of this Petition for Removal is timely because it is filed within thirty days of the date Target Corporation first received notice of the lawsuit.
4. The plaintiff's Complaint in the Superior Court of New Jersey, Law Division,

Middlesex County, asserts damages of a non-specified amount. Plaintiff, Lakisha Carpenter, alleges she was caused to slip and fall and sustain serious and permanent injuries. As such, Target Corporation, believes the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. Target Corporation is informed and believes that Plaintiff, Lakisha Carpenter, is an individual citizen of the State of New Jersey. Defendant/petitioner, Target Corporation is incorporated in the State of Minnesota and its principal place of business is in the State of Minnesota. The action is therefore between citizens and a corporation of other states.

6. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

WHEREFORE, Petitioner, Target Corporation, defendants in the action described herein, which is currently pending in the Superior Court of the State of New Jersey, Law Division, Middlesex County, Docket No. MID-L-2073-22, prays that this action be removed therefrom to this Court.

DATED: May 27, 2022

Target Corporation i/p/a Target

BY: 
Christopher E. McIntyre, Esq.

I certify that a true copy of the Complaint filed in the Superior Court of the State of New Jersey, County of Middlesex, along with a copy of the Summons issued to this defendant, is annexed hereto as Exhibit A.


BY: 
Christopher E. McIntyre, Esq.

EXHIBIT A

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Filing Attorney-Scott A. Telson, Esq.
 Filing Attorney-ID# 017541980
 LOMBARDI & LOMBARDI, P.A.
 1862 Oak Tree Road, P.O. Box 2065
 Edison, New Jersey 08818
 (732) 906-1500-File No.: 22-30608SAT
 Attorneys for Plaintiff

LAKISHA CARPENTER	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: MIDDLESEX COUNTY
Plaintiff,	:	DOCKET NO.:
vs.	:	
	:	Civil Action
TARGET	:	
	:	
	:	COMPLAINT AND JURY DEMAND
Defendant(s),	:	

The plaintiff, Lakisha Carpenter, residing at 51 Schmidt Lane, Township of North Brunswick, County of Middlesex and State of New Jersey, by way of Complaint against the defendant says:

FIRST COUNT

1. On May 15, 2021 and prior thereto, the defendant, Target, owned and was in control of certain premises located at 101 Grand Avenue, North Brunswick, New Jersey.

2. On May 15, 2021 and prior thereto, defendant, did negligently, improperly and carelessly maintain and supervise the aforementioned premises, and more particularly, failed to give warning to guests of the dangerous and hazardous condition that existed in said area, that being liquid on the walking area of the store.

3. As a direct and proximate result of the aforementioned negligence, carelessness and omissions of the defendants, the plaintiff, was caused to slip and fall and

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did sustain serious and permanent injuries of both mind and body, did suffer great pain of mind and body, did incur medical and hospital expenses in an attempt to cure herself of the injuries so sustained, was deprived of carrying out her normal activities and affairs and was otherwise damaged.

WHEREFORE, the plaintiff, Lakisha Carpenter, demands judgment against the defendant, Target, for compensatory damages together with interest and cost of suit.

JURY DEMAND

Plaintiff does hereby demand a trial by a jury of six (6) persons on all issues so triable.

CERTIFICATION

The undersigned certifies that, to the best of his knowledge and belief, there is not pending any other action which arises from the incident alleged in the Complaint or which involves the parties to this action.

CERTIFICATION R.4:5-1 (b) (3)

The undersigned certifies that the within pleadings contains no personal confidential identifiers. The undersigned recognizes a responsibility to ensure the same as to subsequent pleadings.

Dated: April 29, 2022



Scott A. Telson, Esq.
(Attorney for plaintiff)

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Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-002073-22

Case Caption: CARPENTER LAKISHA VS TARGET
Case Initiation Date: 04/29/2022
Attorney Name: SCOTT A TELSON
Firm Name: LOMBARDI & LOMBARDI
Address: 1882 OAK TREE ROAD
EDISON NJ 088200000
Phone: 7329081500
Name of Party: PLAINTIFF : CARPENTER, LAKISHA
Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY
Document Type: Complaint with Jury Demand
Jury Demand: YES - 6 JURORS
Is this a professional malpractice case? NO
Related cases pending: NO
If yes, list docket numbers:
Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Are sexual abuse claims alleged by: LAKISHA CARPENTER? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, Is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

04/29/2022
Dated

/s/ SCOTT A TELSON
Signed

Filing Attorney-Scott A. Telson, Esq.
 Filing Attorney-ID# 017541980
 LOMBARDI & LOMBARDI, P.A.
 1862 Oak Tree Road, P.O. Box 2065
 Edison, New Jersey 08818
 (732) 906-1500-File No.: 22-30608SAT
 Attorneys for Plaintiff

LAKISHA CARPENTER	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: MIDDLESEX COUNTY
Plaintiff,	:	DOCKET NO.: MID-L-2073-22
vs.	:	
	:	Civil Action
TARGET	:	
	:	
	:	SUMMONS
Defendant(s),	:	

From the State of New Jersey, To the Defendant (s) Named Above:

TARGET

The plaintiff, named above, has filed a lawsuit in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (A directory of the addresses of each Deputy Clerk of the Superior Court is available in the Civil Division Management office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, New Jersey 08625. A filing fee* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney, whose name and address appear above, or to plaintiff if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee of \$135.00 and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: April 29, 2022



Michelle M. Smith
Clerk of the Superior Court

Name of and address of Defendant to be served: Target- 101 Grand Avenue, North Brunswick, New Jersey 08902

Revised 09/04/12, CN 10792-English (Appendix XII-A)